

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST, INC.'S MOTION TO STRIKE CERTAIN OPINIONS OF
DEFENDANTS' EXPERT JOHN B. HALBERT**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Motion to Strike Certain Opinions of Defendants’ Expert John B. Halbert. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of John B. Halbert, dated on November 20, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of Volume 1 of the Pretrial Conference Transcript in *Netlist v. Samsung Elecs. Co. Ltd.*, No. 21-cv-463 (E.D. Tex.), dated March 28, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of the Rebuttal Expert Report of John B. Halbert in Case No. 2:21-cv-00463-JRG, dated December 21, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the Rebuttal Expert Report of Matthew R. Lynde, Ph.D., dated December 21, 2023.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of the Rebuttal Expert Report of Lauren R. Kindler, dated December 21, 2023.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of Micron’s Fourth Supplemental Responses and Objections to Plaintiff’s Netlist, Inc.’s First Set of Amended Interrogatories (Nos. 1-20), dated November 15, 2023.

8. Attached as **Exhibit 7** is a true and correct excerpted copy of Samsung’s November 20, 2023 Supplemental Objections and Responses to Plaintiff’s Netlist, Inc.’s Amended First Set of Interrogatories (Nos. 1-20), dated November 20, 2023.

9. Attached as **Exhibit 8** is a true and correct copy of Exhibit F to Samsung's November 6, 2023 Supplemental Interrogatory Responses.

10. Attached as **Exhibit 9** is a true and correct excerpted copy of the October 23, 2023 Motion Hearing Transcript in Case No. 2:22:cv-203-JRG.

11. Attached as **Exhibit 10** is a true and correct copy of Micron Defendants' P.R. 3-3 Invalidity Contentions, dated April 13, 2023.

12. Attached as **Exhibit 11** is a true and correct copy of Samsung Defendants' P.R. 3-3 Invalidity Contentions Regarding U.S. Patent No. 10,268,608, dated September 11, 2023.

13. Attached as **Exhibit 12** is a true and correct copy of Plaintiff Netlist, Inc.'s First Notice of Deposition of Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC Pursuant to Rule 30(b)(6), dated October 19, 2023.

14. Attached as **Exhibit 13** is a true and correct copy of Plaintiff Netlist, Inc.'s First Notice of Deposition of Defendants Samsung Electronics Co., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. Pursuant to Rule 30(b)(6), dated October 19, 2023.

15. Attached as **Exhibit 14** is a true and correct excerpted copy of the deposition transcript of John B. Halbert on September 30, 2023.

16. Attached as **Exhibit 15** is a true and correct copy of the Rebuttal Expert Report of John B. Halbert, dated December 21, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 16, 2024, in Marshall, Texas.

By /s/ Jason G. Sheasby
Jason G. Sheasby